

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
AUGUSTA DIVISION

JANELLE QUINN, individually	)	
and on behalf of her minor child	)	
D.J.Q. Jr.	)	
	)	
	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action No. 1:22-cv-00051-JRH-BKE
	)	
COLUMBIA COUNTY	)	
SCHOOL DISTRICT	)	
	)	
	)	JURY TRIAL DEMANDED
	)	
	)	
Defendant.	)	

**PLAINTIFF’S STATEMENT OF ADDITIONAL MATERIAL FACTS**

1.

On or about February 13, 2015, Ms. Quinn was hired as an MFLC Counselor for Magellan Behavioral Health (hereinafter “Magellan”), of the Military & Family Life Counseling Program (MFLC). Doc. 30-4, pg. 15, line 16.

2.

For the 2020-2021 academic term, Ms. Quinn was assigned to Parkway Elementary and Greenbriar Elementary schools. Doc. 30-4, pg. 17, line 17.

3.

The MFLC counselor program is a federal program that places MFLC counselors with partnered schools. Doc. 30-7, pg. 11, lines 21-23.

4.

MFLC counselors are allowed to work within their assigned schools only with the permission and consent of the local school district. Doc. 30-7, pg. 18, lines 16-23.

5.

While MFLC Counselors remain employees of Magellan, MFLC Counselors are evaluated twice per year by local school district employees, typically the principals of the assigned schools. Doc. 30-7, pg. 15, lines 1-9.

6.

MFLC Counselors serve the schools that they are assigned to for the academic term. If there is no request from the school or the MFLC Counselor, MFLC Counselors will remain in their assigned school. Doc. 30-7, pg. 17, line 17; Declaration of J. Quinn, para 14.

7.

MFLC Counselors cannot remain in their assigned school without consent and approval from the local school district. Doc. 30-7, pg. 18, lines 16-23.

8.

At the time of Ms. Quinn's assignment to Parkway Elementary, her son, D.J.Q. Jr, enrolled at Parkway Elementary as a Kindergarten student. Doc. 30-4, pg. 20, lines 7-19. Declaration of J. Quinn, para 11.

9.

Prior to reporting racial discrimination in January 2021, Ms. Quinn had no knowledge of Magellan's so-called policy prohibiting MFLC counselors from working at the same school that their child attends. Magellan's written conflict of interest policy does not explicitly prohibit parents from working at the same schools that their children attend. Declaration of J. Quinn, para 11.

10.

When Ms. Quinn was hired by Magellan in 2015, she was not asked where her son attended school. Declaration of J. Quinn, para 12.

11.

When Ms. Quinn was hired by Magellan in 2015, she was not presented with any conflict-of-interest paperwork to disclose where her son attended school. Declaration of J. Quinn, para 13.

12.

Parkway Elementary School is a Georgia public elementary school located at 2660 William Few Pkwy, Evans, Georgia 30809. Parkway is located within the Columbia County School District. Doc. 5, Defendant's Answer, para. 11.

13.

Columbia County School District is a recipient of federal funds. Doc. 5, Defendant's Answer, para. 66.

14.

On January 19, 2021, Jr. came home and told his mother, Ms. Quinn, that he had "the worst day ever." Doc. 30-7, pg. 34, lines 21-24.

15.

On January 19, 2021, Ms. Julie Owens, a guidance counselor, employed at Parkway Elementary School had put a dirty utensil in Jr.'s mouth after he requested a clean utensil, saying 'clean that spoon.' Doc. 30-7, pg. 36, lines 1-2.

16.

On January 20, 2021, Ms. Quinn had a meeting with Dr. Michael Doolittle, Parkway Elementary Principal and Ms. Julie Owens to address the incident that had taken place in the cafeteria. Doc. 30-7, pg. 48-49, lines 15-25; lines 1-9.

17.

On January 27, 2021, Ms. Quinn sent out a certified letter to the Superintendent of Columbia County Schools, Superintendent of Parkway Elementary and to all board members regarding the incident with her minor son Jr. Doc. 30-7, pg. 51, lines 1-6.

18.

On February 24, 2021, Ms. Quinn met with Principal Doolittle, Dr. Deborah Williams, and Ms. Julie Owens to express her concerns regarding the school's anemic response regarding D.J.Q. Jr., her minor son. Doc. 30-7, pg. 51, lines 15-25.

19.

Ms. Quinn expressed her concerns and told the administrators; she felt the incident was racist and the school's decision to keep Ms. Julie Owens employed was unacceptable. Doc. 30-7, pg. 51, lines 15-25.

20.

The February 24, 2021, notes written by Dr. Doolittle, from the meeting between Ms. Quinn and Defendant revealed that Ms. Quinn told Columbia County School District that the January 19, 2021, incident was because of D.J.Q. Jr's black skin. Doc. 30-5, Exhibit 2.

21.

Michele Sherman, Associate Superintendent of Columbia County School District, contacted Ms. Beth Welch, Regional Director of Magellan, and supervisor of Ms. Quinn, via phone and via email on April 29, 2021. Doc. 30-7, pg. 27, lines 14-22.

22.

As a result of D.J.Q. Jr's traumatic experience, he no longer felt safe and asked his mother to have him removed from Parkway Elementary and attend another school. 30-4, pg. 109, lines 16-24.

23.

On April 2, 2021, Ms. Quinn sent an email to Tom Smallwood, Hearing Officer at Columbia County School District requesting a waiver request for Jr. to attend Greenbrier Elementary. Mr. Smallwood later approved the transfer request. Doc. 30-4, pg. 109, lines 16-24.

24.

Because of the traumatic incident with Ms. Julie Owens, Ms. Quinn had to enroll her son in counseling services. Jr. attended counseling with Out of the Box Therapy for several months. Doc. 30-4, Exhibit 5, Out of the Box Counseling Records.

25.

In her April 29, 2021, email to Director Welch, Superintendent Sherman writes in relevant part,

“Later, the mother [Ms. Quinn] contacted Assistant Superintendent Dr. Deborah Williams who also spoke with the mother and assured her that the matter was handled appropriately. Following, Ms. Quinn sent certified letters to each board member and the school Superintendent Dr. Sandra Carraway, which prompted another investigation by our office. Upon completion of this investigation, which included a review of video footage, Mrs. Quinn was notified that no further action with the counselor was warranted. This morning the principal notified me that Mrs. Quinn has filed a police report with the Columbia County Sheriff’s Office. At this point, the actions of Mrs. Quinn are causing a disruption to the learning environment at Parkway Elementary School. The school principal has requested that Mrs. Quinn not return to his school as an MFLC counselor, and we support this request.” Doc. 30-6, pg. 17, lines 23-25.

26.

Ms. Quinn did not “disrupt” the learning environment at Parkway Elementary School are false. She did not follow Jr. around between classes at Parkway Elementary School. She did not interfere with the learning environment at Parkway Elementary School. She continued to complete her assigned job duties—providing counseling to MFLC students—until she was reassigned from my post at Parkway Elementary School. Declaration of J. Quinn, para 10.

27.

Ms. Quinn’s employment performance at Parkway Elementary was satisfactory. It was not until she complained of racial discrimination that she was alleged to have been “disruptive” to the learning environment. Doc. 30-7, pg. 54, lines 3-11.

28.

Only two months after Ms. Quinn engaged in protected activity of reporting racial discrimination, Columbia County School District requested that she be reassigned from her Parkway Elementary School placement. Declaration of J. Quinn, para. 15.

29.

Only a few months after engaging in protected activity, Ms. Quinn was transferred to work in another school district altogether, Richmond County for the 2021-2022 academic year. Doc. 30-4, pg. 111, lines 18-23.

30.

Because of the transfer to Richmond County, Ms. Quinn incurred additional commuting expenses and time. Doc. 30-4, Exhibit 4, Gas Receipts.

This 22<sup>nd</sup> day of May 2023.

/s/ Angelik Edmonds

Angelik Edmonds

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[illegible]

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# JURY TRIAL DEMANDED

# CERTIFICATE OF SERVICE

This is to certify that I electronically served Plaintiffs' Statement of Additional Material Facts to the attorneys of record, Leonard O. Fletcher, Jr. at

lofletcher@fhflaw.com, William L. Fletcher, Jr. at willfletcher@fhflaw.com and  
Troy A. Lanier at tlanier@tlanierlaw.com.

DATE: This 22<sup>nd</sup> day of May, 2023

Respectfully submitted,

/s/Angelik Edmonds

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